## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

Hon. Kevin McNulty

GORDON J. COBURN and STEVEN SCHWARTZ

Crim. No. 19-cr-120 (KM-MAH)

## <u>CERTIFICATION OF NICHOLAS J. LEWIN IN SUPPORT OF</u> <u>DEFENDANT'S MOTION TO COMPEL *BRADY* SEARCHES, TO SUPPRESS, AND FOR OTHER RELIEF</u>

- I, NICHOLAS J. LEWIN, hereby certify as follows:
- 1. I am an attorney at law appearing before this Court pursuant to Local Cr.

  Rule 44.1 and am a member of the firm Krieger Kim & Lewin LLP,

  attorneys for Defendant Gordon J. Coburn in the above-captioned matter.
- 2. I make this certification in support of Defendant's Motion to Compel *Brady* Searches, to Suppress, and for Other Relief.
- 3. Attached hereto are true and correct copies of the following documents:

Exhibit No.	Description	<b>Bates Number</b>
1	Document produced by Technology Solutions Corporation ("CTS")	CTS_R17_0005257
2	Document produced by Cognizant CTS	CTS_R17_0005299

3	Document produced by Cognizant CTS	CTS_R17_0005220
4	Document produced by Cognizant CTS	CTS_R17_0005177
5	Document produced by Cognizant CTS	CTS_R17_0004917
6	Document produced by Cognizant CTS	CTS_R17_0000251
7	2022.06.15 Ltr from DOJ	N/A
8	2022.06.15 Ltr from DOJ	N/A
9	Information provided by DLA Piper	N/A
10	2019.06.12 Ltr from DOJ	N/A
11	2019.06.24 Ltr from DOJ	N/A
12	Document produced by government	DOJ-302-00000078
13	Document produced by Cognizant CTS	CTS_R17_0005246
14	Document produced by Cognizant CTS	CTS_R17_0005207
15	Document produced by Cognizant CTS	CTS_R17_0005286
16	Document produced by Cognizant CTS	CTS_R17_0000001
17	Document produced by Cognizant CTS	CTS_R17_0000060
18	Document produced by Cognizant CTS	CTS-0103589
19	Document produced by Cognizant CTS	CTS-0638406
20	Document produced by Cognizant CTS	CTS_R17_0004324
21	Document produced by Cognizant CTS	CTS_R17_0004337

22	Document produced by Cognizant CTS	CTS_R17_0000278
23	Document produced by Cognizant CTS	CTS_R17_0000245
24	Document produced by Cognizant CTS	CTS_R17_0004279
25	Document produced by Cognizant CTS	CTS_R17_0000266
26	Document produced by Cognizant CTS	CTS_R17_0000627
27	Document produced by Cognizant CTS	CTS_R17_0004168
28	Document produced by Cognizant CTS	CTS_R17_0000499
30	Document produced by Cognizant CTS	CTS_R17_0000271
32	Document produced by Cognizant CTS	CTS_R17_0000287
33	Document produced by Cognizant CTS	CTS_R17_0004148
34	Document produced by Cognizant CTS	CTS_R17_0004279
35	Document produced by Cognizant CTS	CTS_R17_0000714
36	Document produced by Cognizant CTS	CTS_R17_0000719
37	Document produced by Cognizant CTS	CTS_R17_0005202
38	Document produced by government	DOJ-CTS-LTR-
		00000257
39	Document produced by Cognizant CTS	CTS_R17_0005206
40	2022.05.11 Ltr from Alston & Bird LLP and Friedman Kaplan Seiler & Adelman LLP	N/A
41	Document produced by Cognizant CTS	CTS_R17_0005177

42	Document produced by government	DOJ-CTS-LTR-
		00001187
43	Document produced by Cognizant CTS	CTS_R17_0005168
44	2019.09.27 Ltr from DOJ	N/A
46	2019.10.30 Ltr from DOJ	N/A
47	2019.12.10 Ltr from DOJ	N/A
48	Document produced by government	DOJ-CTS-LTR-
		00001363
49	2019.08.26 Ltr from DOJ	N/A
51	Document produced by government	DOJ-LT-LTR-
		00000073
52	Document produced by Cognizant CTS	CTS_R17_0005240
53	Document produced by Cognizant CTS	CTS_R17_0005399

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are knowingly and intentionally false, I am subject to punishment.

Dated: July 8, 2022 Respectfully submitted,

/s/ Nicholas J. Lewin

Nicholas J. Lewin Henry L. Ross KRIEGER KIM & LEWIN LLP 500 Fifth Avenue New York, NY 11215 (212) 390-9559 Attorneys for Defendant Gordon J. Coburn